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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 IN RE: UBER TECHNOLOGIES, INC.
12 PASSENGER SEXUAL ASSAULT
13 LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

14 This Document Relates to:

15 *Jaylynn Dean v. Uber Techs., Inc.*,
16 N.D. Cal. No. 23-cv-06708
17 D. Ariz. No. 25-cv-4276

**DECLARATION OF MAYA R. KALONIA IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION
FOR PARTIAL SUMMARY JUDGMENT**

18 I, Maya R. Kalonia, declare:

19 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the
20 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to
21 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to
22 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit
23 this declaration in support of Plaintiff's Administrative Motion to File Under Seal Exhibits to Plaintiff's
24 Opposition to Defendants' Motion for Partial Summary Judgment.

25 2. I have reviewed Exhibits 8, 21, 22, 63, 64, 65, 67, 69, and 70 to Plaintiff's Opposition to
26 Defendants' Motion for Partial Summary Judgment.

27 3. Exhibit 8 is an excerpt of a deposition transcript which includes the birth date of Plaintiff
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DECLARATION OF MAYA R. KALONIA ISO PLAINTIFF'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
EXHIBITS TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Case No. 23-md-03084-CRB

1 and the name of third party, S.M.

2 4. Exhibit 21 is an excerpt of a deposition transcript which includes the birth date of the third-
3 party driver.

4 5. Exhibit 22 is a copy of the third-party driver's license, containing his name, birth date,
5 address, photo, driver's license number, and signature. Uber has designated this document as confidential.

6 6. Exhibit 63 is a copy of the third-party driver's background check report by Accurate,
7 containing his last digits of SSN, partial birth date, and partial driver's license number. Accurate has
8 designated this document as confidential.

9 7. Exhibit 64 is a copy of the third-party driver's background check by Checkr, Inc.,
10 containing the third-party driver's birth date, last digits of SSN, partial driver's license number, email
11 address, and phone number. Uber has designated this document as confidential.

12 8. Exhibit 65 is a copy of the third-party driver's correspondence with Checkr., Inc,
13 containing the third-party driver's email address. Checkr has designated this document as confidential.

14 9. Exhibit 67 is a copy of Checkr, Inc.'s call notes with the third-party driver containing the
15 third-party driver's email address. Checkr has designated this material as confidential.

16 10. Exhibit 69 is a copy of the third-party driver's license, containing address, date of birth,
17 photo, driver's license number, and signature. Uber has designated this document as confidential.

18 11. Exhibit 70 is a copy of the third-party driver's background check by Checkr, Inc.,
19 containing the third-party driver's birth date, last digits of SSN, partial driver's license number, email
20 address, and phone number. Uber has designated this document as confidential.

21 12. The significant privacy concerns of Plaintiff and third parties outweigh any minimal public
22 interest in disclosure of their highly sensitive information. The public's interest in the case may be satisfied
23 without revealing this information.

24 13. The disclosure of personally identifiable information would harm the legitimate privacy
25 interests of Plaintiff and third parties. Plaintiff's request is narrowly tailored to sealing only PII. There is
26 no less restrictive alternative to sealing the relevant materials that would protect the legitimate privacy
27 interests Plaintiff's request is narrowly tailored to seal only PII.

1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed on December 10, 2025 in Oakland, California.

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4 /s/ Maya R. Kalonia

5 Maya R. Kalonia
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